

Anti-Bribery Policy



A) DEFINITION

Bribery is, in the conduct of the Company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Recognise Design Limited employees or by third parties acting for or on behalf of Recognise Design Limited.

B) PURPOSE

The purpose of this policy is to convey to all employees and interested parties of Recognise Design Limited the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Recognise Design Limited conducts its business in a fair, professional and legal manner.

C) OFFENCE

It is a criminal offence to:

- offer a bribe
- accept a bribe
- bribe a foreign official
- as a commercial organisation, to fail to prevent a bribe

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

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D) DEFINITIONS OF BRIBERY AND CORRUPTION

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

E) SCOPE

This policy applies to all employees of Recognise Design Limited, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self employed basis or an agency arrangement. We will encourage the application of this policy where our business involves the use of third parties

e.g. suppliers; contractors.

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F) GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation. Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from Jordan Ffolkes Director.

Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from Jordan Ffolkes Director. A record will be made of every instance in which gifts or hospitality are given or received. As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

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G) POLICY

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical. It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact Jordan Ffolkes Director so that action can be taken if considered necessary. You may be asked to give a written account of events.

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